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1 UNITED STATES DISTRICT COURT

2 DISTRICT OF MASSACHUSETTS

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4 INA STEINER, DAVID STEINER and
5 STEINER ASSOCIATES, LLC

6 Plaintiffs

7 vs. CA No. 21-CV-11181-PBS

8 eBAY, INC. et al.

9 Defendants

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12 VIDEO DEPOSITION of INA STEINER

13 Friday, September 23, 2024 - 10:07 a.m.

14 Sidley Austin LLP

15 60 State Street

16 Boston, Massachusetts

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19 Reporter: Jill K. Ruggieri, RPR, RMR, FCRR, CRR

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1 Q And do you agree with that, that
2 there's no prospect of a full recovery?

3 MR. FROMSON: Just note my
4 objection to form.

5 A I don't -- I don't know.

6 Q You don't know?

7 A I don't know.

8 Q Now, in terms of the emotional, you
9 say it's at a 6 and a half, okay, as of today.
10 This is five years later.

11 So I want to ask you in your own
12 view to sort of compare what you have -- what
13 you have suffered with the following.

14 A minor female who from the age
15 of 7 to 17 is systematically sexually abused by
16 her stepfather and then further emotionally
17 abused by her stepfather over a period of
18 years, intentionally inflicted emotional
19 distress on that minor female, would you say
20 that in your view, what you went through, is --
21 what you currently are experiencing in terms of
22 anxiety and depression is worse, not worse or
23 the same?

24 MR. FROMSON: Objection as to
25 form.

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1 A I -- I can't even believe you're
2 asking. I mean, a child? I -- I just -- I
3 can't fathom, so I -- I would never compare
4 that. I would never -- I would never -- I
5 wouldn't know how to compare that.

6 Q Well, let's try -- let's assume that
7 that pattern I just gave you is at a 10.

8 Where would you put where you
9 are compared to that?

10 MR. FROMSON: Hold on. Just
11 note my objection to form.

12 Q Compared -- fair enough.

13 MR. FROMSON: Ask your question,
14 and then I'll place my objection.

15 Q Compared to a minor female who is
16 sexually abused over ten years.

17 How would you compare it?

18 MR. FROMSON: Note my objection
19 to form. And also she's been asked and
20 answered. She said she can't fathom or compare
21 it.

22 Over my objection, go ahead and
23 try to answer it, if you can.

24 A I can't answer -- I won't -- I mean,
25 I can't. I'm sorry, I can't answer that.

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1 Q Is -- well, you can't answer it; you
2 can't give me the number.

3 But is it fair to say that what
4 you've gone through is not as bad as what you
5 imagine that child has gone through?

6 MR. FROMSON: Objection. Form.

7 A I think it's so offensive, but I will
8 try to answer it. I -- I don't know why you
9 would compare what eBay did to me with what a
10 cruel person would do to a child.

11 It doesn't make sense to me. I
12 can't wrap my head around --

13 Q So is the answer it's -- what
14 happened to that child is worse?

15 A It's --

16 MR. FROMSON: Hold on. Hold on.
17 Objection as to form.

18 A I -- I -- I think that's just -- I
19 just don't know how to answer that, because --

20 Q You can answer it by saying --

21 MR. FROMSON: Hold on. You got
22 to let her finish. Got to let her finish.

23 Q By saying is it worse or not. The
24 answer -- the question is quite clear,
25 Ms. Steiner.

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1 Are you saying that it's worse
2 or not worse?

3 MR. FROMSON: Objection as to
4 form. It's been asked and answered.

5 MR. PIROZZOLO: No, it hasn't
6 been answered. She's refused to answer.

7 MR. FROMSON: Actually, not
8 true.

9 The record will speak for
10 itself. But given the conversation and for
11 clarity, she said she could not answer it,
12 right, based on the comparison.

13 And the incomplete hypothetical
14 that you gave is part based on my objection --

15 MR. PIROZZOLO: If it's an
16 incomplete hypothetical, I'll ask again.

17 BY MR. PIROZZOLO:

18 Q Ms. Steiner, so now you're not
19 understanding --

20 MR. FROMSON: Let me finish my
21 objection.

22 The objection as to form still
23 stands. I'm not going to preclude the witness
24 from trying to answer it, but the objection to
25 form still stands.

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1 MR. PIROZZOLO: And the question
2 is quite clear, but I'll ask it again.

3 BY MR. PIROZZOLO:

4 Q I asked you -- I gave you the
5 hypothetical of a child who's sexually molested
6 over ten years by her stepfather, who has
7 suffered intentional infliction of emotional
8 distress as a result of that conduct.

9 Is it your view that that
10 conduct is worse than what you have gone
11 through?

12 MR. FROMSON: Objection as to
13 form.

14 A You originally asked me to compare on
15 a scale, with that being 10, and that is
16 unanswerable.

17 Is it worse? Is it worse for
18 that child? Of course it is.

19 Q Substantially worse?

20 MR. FROMSON: Objection to form.

21 A It is substantially worse.

22 Q And I'm going to give you one more
23 hypothetical, and then I think I'm going to be
24 done.

25 Let's say that comparing what